



TECHNICAL BULLETIN

August 18, 2021

Compliant Creation of Inhalable Compound Concentrate Products and Raw Pre-Rolls

The purpose of this technical bulletin is to provide clarification to licensees regarding the compliant creation and subsequent testing of inhalable compound concentrate products and raw pre-rolls.

Inhalable Compound Concentrate Products

Inhalable compound concentrate products are defined as any products that are created by combining one or more marijuana concentrate products – and any other category of inhalable product (marijuana flower, kief, etc.) – into a final form intended for inhalation.

Each marijuana concentrate product or inhalable product used to create the inhalable compound concentrate products is considered a “component.”

“Final form” is defined as the form a marijuana product is in when it is available for sale by a marijuana sales location.

Cultivators and sales locations are not permitted to add concentrate to pre-rolls or to create inhalable compound concentrate products.

Commonly Created Inhalable Compound Concentrate Products

- *Moon rocks* – marijuana buds or flower infused or coated with marijuana concentrate and subsequently rolled in kief. Sold by weight in gram increments.
- *Caviar* – often the same as moon rocks but may not include the addition of kief.
- *Tarantula* – marijuana flower/shake/trim, a coating of distillate, with kief and/or hash added, and then rolled into a pre-roll joint. Sold by the unit or by weight.
- *Infused pre-roll* – marijuana flower/shake/trim along with the inclusion of distillate, addition of any concentrate, or addition of kief combined into a pre-roll joint. Sold by the unit or by weight. Previously identified as “pre-roll with concentrate added” in this [Common Issues Bulletin](#).

Note: Infused pre-rolls are not subject to the same regulations as marijuana-infused products otherwise more commonly known as “edibles” or non-edible topical products.

This technical bulletin does not constitute legal advice and is subject to change. It is intended to provide a technical clarification only to the MRA's Administrative Rules. Licensees are encouraged to seek legal counsel to ensure their operations comply with the Administrative Rules. More information on the MRA can be found at the agency's [website](#).



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Required Testing for Inhalable Compound Concentrate Products

Once the inhalable compound concentrate products (such as those identified on page one) have been created, the products must be tested in final form.

Raw Pre-Rolls

Raw pre-rolls contain only marijuana flower/shake/trim and the rolling paper/tip/filter used to give structure to and assist in the function of the pre-rolls. Typically, an adhesive is used to seal the products.

If the adhesive used on the products is marijuana concentrate, the products are considered inhalable compound concentrates, and the licensee must have the products tested in final form.

Cultivators, Producers, and Sales Locations Creating Raw Pre-Rolls

Raw pre-rolls made from bud, shake, or trim from the same strain and harvest batch do not need to be re-tested in final form if the bud, shake, or trim used to create the pre-rolls has already passed full compliance testing. The following restrictions apply to raw pre-rolls:

- Pre-rolls may not be made with mixed strains
- Adding hemp flower, CBD concentrate, or any other product except for the paper wrap is not permitted
- Adding kief to pre-rolls that is not the same strain and harvest batch as the flower used in the raw pre-roll (kief not already present in the flower) is not permitted
- Sales locations are not permitted to add kief to raw pre-rolls

Required Testing for Raw Pre-Rolls without Kief Added

If the flower has passed full compliance prior to creating a raw pre-roll, the product does not need to be tested in final form.

Required Testing for Raw Pre-Rolls with Kief Added

If a cultivator or processor adds kief to raw pre-rolls – that are the same strain and harvest batch as the flower – the products must be tested in final form.



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All questions and inquiries related to the compliant creation of these products should be directed to MRA-compliance@michigan.gov. All questions and inquiries related to the testing of these products should be directed to MRA-scf@michigan.gov.